

STATEMENT OF BASIS (AI No. 42734)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0124249 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: BJ Services Company, USA
Intracoastal City Completion Fluids Plant
203 Commission Boulevard
Lafayette, Louisiana 70508

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: July 25, 2008

1. PERMIT STATUS**A. Reason For Permit Action:**

First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit – NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits – LPDES permit effective date: N/A
LPDES permit expiration date: N/A

D. Date Application Received: April 10, 2008

Note: The facility submitted an LPDES Notice of Intent to Discharge Sanitary Wastewater. This facility requires stormwater coverage in addition to coverage for their sanitary wastewater; therefore, this facility will be issued an individual permit to include their stormwater requirements.

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - oilfield completion fluids plant**

BJ Services Company, USA, Intracoastal City Completion Fluids Plant is an existing facility that blends, transfers, and stores completion fluids. Fluids are brought in by truck or barge and are transferred to stock tanks. Products that need to be blended are done so in a blending tank. Transfers between tanks do not require hoses to be connected and disconnected as both the stock and blending tanks are joined together by manifolds. If additives are needed, these are added to the blend tank from the top. Fluids, that are ready for customers, are transferred to holding tanks on sea-going vessels for transportation to customer locations.

Statement of Basis for
BJ Services Company, USA
Intracoastal City Completion Fluids Plant
LA0124249, AI No. 42734
Page 2

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II *
3. Wastewater Type: III
4. SIC code: 1389

*BPJ points to 0 based on low flow and similar facilities.

C. LOCATION - 12366 Offshore Road, Abbeville, Vermilion Parish
Latitude 29° 46' 38", Longitude 92° 10' 24"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant with solids separation and aeration
Location: at the point of discharge from the sewage treatment plant
Flow: 350 gpd
Discharge Route: effluent pipe thence to the Intracoastal Waterway

4. RECEIVING WATERS

STREAM - local drainage to the Intracoastal Waterway

BASIN AND SEGMENT - Vermilion-Teche Basin, Segment 060804

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 060804, Intracoastal Waterway from Vermilion Lock to ½ mile west of Gum Island Canal, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 060804 was previously listed as impaired for suspended solids/turbidity/siltation, for which the below TMDL has been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

Statement of Basis for
BJ Services Company, USA
Intracoastal City Completion Fluids Plant
LA0124249, AI No. 42734
Page 3

The following TMDL has been established for subsegment 060804:

TSS, Turbidity and Siltation for the 15 Subsegments in the Vermilion River Basin

Suspended solids/turbidity/siltation are among the effluent characteristics listed for discharges of treated sanitary wastewater; however, as per the EPA's TMDL Siltation for the 15 Subsegments in the Vermilion River Basin, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. The discharge for this facility should not cause or contribute to the violation of water quality standards for TSS in the receiving stream.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. OEC -

There have been no inspections at the facility.

B. DMR Review/Excursions -

There are no DMR's as BJ Services Company, Intracoastal City Completion Fluids Plant has never had a permit at this location.

8. EXISTING EFFLUENT LIMITS

N/A

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 060804 of the Vermilion-Teche Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no

Statement of Basis for
BJ Services Company, USA
Intracoastal City Completion Fluids Plant
LA0124249, AI No. 42734
Page 4

consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
 BJ Services Company, USA
 Intracoastal City Completion Fluids Plant
 LA0124249, AI No. 42734
 Page 5

Rationale for BJ Services Company, USA

1. **Outfall 001 - treated sanitary wastewater (estimated flow is 350 gpd)**

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg: Weekly Avg (mg/l)	<u>Reference</u>
Flow (gpd)	Report: Report	BPJ; LAG480000 and similar discharges
BOD ₅	---: 45	BPJ; LAG480000 and similar discharges
TSS	---: 45	BPJ; LAG480000 and similar discharges
Fecal Coliform		
Colonies/100ml	---:400 (Daily Max)	BPJ; LAG480000 and similar discharges
pH	6.0 : 9.0	BPJ; LAG480000 and similar discharges
standard units	(min): (max)	

Treatment: sewage treatment plant with solids separation and aeration

Monitoring Frequency: semiannually for all parameters (BPJ; as per the Light Commercial General Permit (LAG480000), Schedule A, Treated Sanitary Wastewater less than 5000 GPD and similar discharges).

Limits Justification: BPJ; per the Light Commercial General Permit (LAG480000), Schedule A, Treated Sanitary Wastewater less than 5000 GPD and similar discharges

BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).